

68048

MAR 28 1990

EXPRESS MAIL--
RETURN RECEIPT REQUESTED

Mr. Donald Murphy
Facility Coordinator
Langan Environmental Services
River Drive Center 2
Elmwood Park, NJ 07407

Re: SCP-Carlstadt Site, Administrative Order, Index No. II-CERCLA-50114

Dear Mr. Murphy:

Attached you will find the Environmental Protection Agency's (EPA) required revisions to the latest Draft Feasibility Study (FS) submitted by the Respondents pursuant to the above-referenced Order on August 1, 1989. Please ensure that the report is revised in accordance with EPA's changes. The revised report should be submitted to EPA by no later than two weeks from your receipt of this letter.

As was discussed with the Respondents at a meeting on February 28, 1990, the interim remedy which EPA plans to propose consists of a slurry wall, groundwater extraction, treatment and disposal. Based on the Respondents' FS, EPA anticipated that the disposal of this water would be accomplished through treatment at the site, with subsequent discharge to either Peach Island Creek or the local Publicly Owned Treatment Works (POTW). However, Respondents have recently informed EPA that it is unlikely that the POTW will accept the treated groundwater. In addition, EPA has not yet received the applicable or relevant and appropriate standards for discharge to Peach Island Creek from NJDEP. Consequently, in order to have an alternative disposal option for the interim remedy, EPA is hereby instructing Respondents to revisit the option of off-site disposal of the groundwater.

Please submit an analysis of this off-site disposal option by no later than April 10, 1990. The analysis should include cost estimates, volume estimates (for both initial dewatering and periodic maintenance) and disposal sites proposed. EPA will then evaluate this option, along with the option of discharge to Peach Island Creek.

HANGE.SCP:3/28/90

[illegible]

If you have any questions concerning the FS revisions, please contact Janet Feldstein of my staff, at (212) 264-0613.

Sincerely yours,

Raymond Basso, Chief
New Jersey Compliance Branch

Attachment

cc: William Warren
Pam Lange

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Changes To Feasibility Study

General Comments

As previously discussed, delete the partial site remediation alternatives developed and evaluated in the July 27, 1989. These partial site remediation alternatives were inappropriately developed contrary to EPA's comment on the first draft Feasibility Study. (Sections 3 and 4 of the FS)

Revise the discussions of the Land Disposal Restrictions to reflect that, if the Treatability Variance levels are achieved during treatment, construction of a Minimum Technology facility is not required prior to replacement on site. (Sections 3 and 4)

The references to the Dames & Moore Remedial Investigation should be changed to the most recent version of the report (3/90). (throughout document)

The references to the Clement Associates Endangerment Assessment should be changed to the most recent version of the report (3/90, now entitled "Baseline Risk Assessment"). (throughout document)

Specific Comments

Page 1-13

Bedrock aquifer data are available. Discussion should be revised as follows:

"Data collected from a bedrock well installed at the site indicates that site-related contaminants have migrated down to this aquifer. Further investigation of the bedrock aquifer quality off-site is planned."

Page 1-14

Move discussion of utility lines from "Data Gaps" to a separate section.

Page 1-15

In the discussion of the tank sludge, delete the sentence "The sample was taken by USEPA". Replace with "The sample was collected and analyzed for the Site owner during their performance of initial remedial measures at the site in 1986."

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Section 2

Page 2-5

In Section 2.2.4, lines 16 and 17, revise the second sentence in the first paragraph to read: "Tables 1-1, 1-2, 1-3 and 1-4 summarize the results of samples analyses."

Page 2-6

On line 9, change "mitigation" to "migration."

Page 2-42 through 2-43

Revise the sentence beginning on Page 42, line 36 by deleting the phrase "and are disposed in an on-site minimum technology facility".

Also delete the sentence beginning on Page 43, line 10 which reads "As stated above,..."

Page 2-49 through 2-50

Delete Alternatives S/S-4a-d, S/S-6a-d, S/S-12a-d, S/S-13a-d, S/S-16'a-d, and S/S-17a-d.

Section 3

Pages 3-2 through 3-3

In section 3.1.1.2, delete the seven paragraphs beginning with "This document also considers the partial site treatment of soil/sludge...."

Page 3-4

In section 3.1.1.2.2, delete the present paragraph in the section. Replace with a paragraph which reads:

"Because the site contains soil/sludge contaminated with PCBs at levels exceeding 50 ppm, the disposal/treatment of these materials is regulated Under the Toxic Substances Control Act ("TSCA"). Soil/sludge contaminated with PCBs over 50 ppm which are moved from one area of the site to another must be incinerated, treated by a method equivalent to incineration (to a residual of 2 ppm), or disposed of in a chemical waste landfill. This FS includes incineration alternatives and vitrification alternatives (which is considered equivalent to incineration) in order to comply with the TSCA requirements. It is unknown whether other

treatment alternatives (e.g. contaminant extraction, stabilization) would be able to achieve the PCB residual concentration of less than 2 ppm necessary to comply with the TSCA requirements.

Pages 3-58 through 3-64

Delete Sections 3.4.4a through 3.4.4d.3.

Pages 3-70 through 3-75

Delete Sections 3.4.6a through 3.4.6d.3.

Pages 3-88 through 3-91

Delete Sections 3.4.12a through 3.4.12d.3.

Pages 3-96 through 3-101

Delete Sections 3.4.13a through 3.4.13d.3.

Pages 3-107 through 3-110

Delete Sections 3.4.16a through 3.4.16d.3.

Pages 3-111 through 3-115

Delete Sections 3.4.17a through 3.4.17d.3.

Pages 3-131 through 3-133

Delete Site-wide Alternatives D'-1-4, H-1-4, I-1-4, J-1-4, and K-1-4.

Section 4

Page 4-4

In the second paragraph, move the parenthetical phrase "nonliquid hazardous wastes containing halogenated organic compounds..." to the next sentence, after "'California List' wastes." In addition, change the reference to Table 4-1a (from Table 4a).

Delete the paragraph beginning "After successful treatment to the interim treatment levels/ranges, a minimum technology facility would be required for disposal of the treated soil/sludge, on site...." Also delete the following Section 4.2.2.2 "Minimum Technology Facility". A minimum technology facility would not be required for replacement of the treated material on site, as long as the treatability variance levels are attained.

Page 4-38

In the second paragraph, delete the sentence which begins "This variance will result in...." Replace with the following sentence: "However, it is unknown whether stabilization would be able to achieve the required interim treatment levels/ranges provided in Table 4-1a."

Page 4-46

Delete the two sentences which read "The leachate could include detectable levels of organic compounds not removed by vacuum extraction. However, the leachate is not expected to adversely affect human health and the environment...." Replace with "It is unknown whether the stabilization process would be effective for organic compounds not removed via vacuum extraction."

Pages 4-52 through 4-61

Delete Sections 4.3.4'a through 4.3.4'd.10.

Page 4-68

In the second paragraph, delete the sentence which begins "This variance will result in...." Replace with the following sentence: "However, it is unknown whether contaminant extraction would be able to achieve the required interim treatment levels/ranges provided in Table 4-1a."

Page 4-78

Delete the sentence which begins "This variance will result in...." Replace with the following sentence: "However, it is unknown whether contaminant extraction followed by stabilization would be able to achieve the required interim treatment levels/ranges provided in Table 4-1a."

Page 4-86

In the third paragraph, delete the sentence which begins "This variance will result in...." Replace with the following sentence: "However, it is unknown whether contaminant extraction followed by stabilization would be able to achieve the required interim treatment levels/ranges provided in Table 4-1a."

Pages 4-104 through 4-115

Delete Sections 4.3.8a through 4.3.8d.9

Page 4-118

In the last paragraph, delete the sentence which begins "This variance will result in...." Replace with the following sentence: "It is likely that incineration followed by stabilization would be able to achieve the required interim treatment levels/ranges provided in Table 4-1a."

Page 4-120

Delete the sentence which begins "Contaminants have already been demonstrated to migrate..." Replace with "Since the organics would be destroyed and the inorganics immobilized, it is unlikely that there would be any future migration of contaminants from the treated material."

Pages 4-126 through 4-135

Delete Sections 4.3.9a through 4.3.9d.10

Page 4-140

In the first paragraph, delete the sentence which begins "This variance will result in...." Replace with the following sentence: "It is likely that metals extraction followed by incineration would be able to achieve the required interim treatment levels/ranges provided in Table 4-1a."

Pages 4-148 through 4-156

Delete Sections 4.3.10a through 4.3.10d.10.

Pages 4-167 through 4-176

Delete Sections 4.3.11a through 4.3.11d.10.

Page 4-176

On line 23, change "thirty-two" to "twelve."

Tables

In Table 3-9, replace the values listed under "NJAC 7:14A, Appendix F, Saline Criteria" with those provided in the attachment to these comments (Appendix F, Maximum Values for Protection of Aquatic Life, Saltwater values). Table 3-9 should be expanded to include all existing criteria, rather than the criteria for selected compounds.

In Table 3-13, delete Alternatives S/S-4a-d, S/S-6a-d, S/S-12a-d, S/S-13a-d, S/S-16'a-d, and S/S-17a-d.

In Table 3-15, delete Alternatives S/S-4a-d, S/S-6a-d, S/S-12a-d, S/S-13a-d, S/S-16'a-d, and S/S-17a-d.

In Table 4-1, delete Alternatives D'-1, D'-2, D'-3, D'-4, H-1, H-2, H-3, H-4, I-1, I-2, I-3, I-4, J-1, J-2, J-3, J-4, K-1, K-2, K-3 and K-4.

In Table 4-3, under "Long-Term Effectiveness: change the following:

For Alternatives E and F: change to "moderate"

Under "Implementability" change the following:

For Alternatives H, I, J, change to "moderate"

Under "Protection of Human Health and the Environment" change the following:

For Alternative B: change to "moderate"
For Alternative C: change to "moderate"
For Alternative E: change to "moderate"
For Alternative F: change to "moderate"

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Under "Short-Term Effectiveness,"

For Alternative B: change to moderate
For Alternative C: change to moderate
For Alternative D': change to moderate
For Alternative E: change to moderate
For Alternative F: change to moderate
For Alternative G: change to moderate

Also, delete alternatives D'1-4, H1-4, I1-4, J1-4, and K1-4.

APPENDIX E

Primary Industry Categories

Adhesives and Sealants	Organic Chemicals Manufacturing
Aluminum Forming	Paint and Ink Formulation
Auto and Other Laundries	Pesticides
Battery Manufacturing	Petroleum Refining
Coal Mining	Pharmaceutical Preparations
Coil Coating	Photographic Equipment and Supplies
Copper Forming	Plastics Processing
Electrical and Electronic Components	Plastic and Synthetic Materials Manufacturing
Electroplating	Porcelain Enameling
Explosives Manufacturing	Printing and Publishing
Foundries	Pulp and Paper Mills
Gum and Wood Chemicals	Rubber Processing
Inorganic Chemicals Manufacturing	Soap and Detergent Manufacturing
Iron and Steel Manufacturing	Steam Electric Power Plants
Leather Tanning and Finishing	Textile Mills
Mechanical Products Manufacturing	Timber Products Processing
Nonferrous Metals Manufacturing	
Ore Mining	

OFFICE OF ADMINISTRATIVE LAW NOTE: For a breakdown of the particular subcategories included in the primary industry categories, see the Federal Register for June 26, 1978 at 43 FR27736, 27771 (Appendix C).

APPENDIX F

VALUES FOR DETERMINATION OF NJPDES PERMIT OF NJPDES PERMIT TOXIC EFFLUENT LIMITATIONS
(Concentrations are in micrograms per liter unless otherwise noted)

Chemical	Maximum Values for Protection of Aquatic Life		Maximum Values for Protection of Potable Water Supplies	
	Freshwater	Saltwater	10 ⁻⁶ Cancer Risk	Toxicity
Acenaphthene	1,700	710	-	-
Acrolein	21	55	-	320
Acrylonitrile	7,550	-	0.058	-
Aldrin - Dieldrin	-	-	-	-
Aldrin	3.0	1.3	0.074 ng/l	-
Dieldrin	0.0019*	0.0019*	0.071 ng/l	-
Antimony	1,600	-	-	146
Arsenic (trivalent inorganic)	440	508	2.2 ng/l	-
Asbestos	-	-	30,000 fibers/l	-
Benzene	5,300	5,100	0.66	-
Benzidine	2,500	-	0.12 ng/l	-
Beryllium	5.3	-	3.7 ng/l	-
Cadmium**	0.012*	4.5*	-	10
Carbon Tetrachloride	35,200	50,000	0.40	-
Chlordane	0.0043*	0.0040*	0.46 ng/l	-
Chlorinated Benzenes	250	129	(See below)	488
Monochlorobenzene	-	-	-	-
Trichlorobenzenes	-	-	-	-
Tetrachlorobenzene (1,2,4,5)	-	-	-	38

14A-238

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Pentachlorobenzene			—	74
Hexachlorobenzene			0.72 ng/l	—
Chlorinated Ethanes				
Chloroethane	—	—	—	—
1,1-Dichloroethane	—	—	—	—
1,2-Dichloroethane	20,000	113,000	0.94	—
1,1,1-Trichloroethane	18,000	31,200	—	18.4 mg
1,1,2-Trichloroethane	9,400	—	0.6	—
1,1,1,2-Tetrachloroethane	9,320	—	—	—
1,1,2,2-Tetrachloroethane	2,400	9,020	0.17	—
Pentachloroethane	1,100	281	—	—
Hexachloroethane	540	940	1.9	—
Chlorinated Naphthalenes	1,600	7.5	—	—
Chlorinated Phenols				
3-Chlorophenol	—	—	—	—
4-Chlorophenol	—	29,700	—	—
2,3-Dichlorophenol	—	—	—	—
2,5-Dichlorophenol	—	—	—	—
2,6-Dichlorophenol	—	—	—	—
3,4-Dichlorophenol	—	—	—	—
2,4,5-Trichlorophenol	—	—	—	2.6 mg/l
2,4,6-Trichlorophenol	970	—	1.2	—
2,3,4,6-Tetrachlorophenol	—	—	—	—
2,3,5,6-Tetrachlorophenol	—	440	—	—
2-Methyl-4-chlorophenol	—	—	—	—
3-Methyl-4-chlorophenol	30	—	—	—
3-Methyl-6-chlorophenol	—	—	—	—
Chloroalkyl Ethers		238,000	—	—
Bis (chloromethyl)	—	—	—	—
ether	—	—	0.0038 ng/l	—
Bis (2-chloroethyl)	—	—	—	—
ether	—	—	0.03	—

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Bis (2-chloroisopropyl)				34.7
ether	—	—	—	—
Chloroform	28,900	—	0.19	—
3-Chlorophenol	4,380	—	—	—
Chromium				
Trivalent	44	10,300	—	170 mg/l
Hexavalent	0.29*	18*	—	50
Copper	5.6*	4.0*	—	—
Cyanide (free CN)	3.5*	30	—	200
DDT and Metabolites				
DDT	0.0010*	0.0010*	0.024 ng/l	—
TDE	0.6	3.6	—	—
DDE	1,050	14	—	—
Dichlorobenzenes	763	1,970	—	400
Dichlorobenzidines	—	—	0.0103	—
Dichloroethylenes	11,600	224,000	—	—
1,1-Dichloroethylene	—	—	0.033	—
1,2-Dichloroethylene	—	—	—	—
2,4-Dichlorophenol	363	—	—	3.09 mg/l
Dichloropropanes	5,700	3,040	—	—
Dichloropropenes	244	790	—	87
2,4-Dimethylphenol	2,120	—	—	—
2,4-Dinitrotoluene	230	590	0.11	—
1,2-Diphenylhydrazine	270	—	42 ng/l	—
Endosulfan	0.056*	0.0087*	—	74
Endrin	0.0023*	0.0023*	—	1
Ethylbenzene	32,000	430	—	1.4 mg/l
Fluoranthene	3,980	16	—	42
Haloothers	122	—	—	—
Halomethanes	11,000	6,400	0.19	—
Bromomethane	—	—	—	—
Chloromethane	—	—	—	—

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Trichloroethane	—	—	—	—
Bromochloroethane	—	—	—	—
Trifluoromethane	—	—	—	—
Dichlorodifluoromethane	—	—	—	—
Trichlorofluoromethane	—	—	—	—
Tetrachloromethane (See Carbon Tetrachloride)	—	—	—	—
Mixtures of halomethanes	—	—	—	—
Heptachlor	0.0038*	0.0036*	0.28 ng/l	—
Hexachlorobutadiene	9.3	32	0.45	—
Hexachlorocyclohexane (HCH, BHC)	—	—	—	—
Lindane (gamma-HCH)	0.080*	0.16	18.6 ng/l	—
HCH (mixture of isomers)	100	0.34	—	—
alpha-HCH	—	—	9.2 ng/l	—
beta-HCH	—	—	16.3 ng/l	—
gamma-HCH	—	—	12.3 ng/l	—
delta-HCH	—	—	—	—
epsilon-HCH	—	—	—	—
Hexachlorocyclopentadiene	5.2	7.0	—	206
Isophorone	117,000	12,900	—	5.2 mg/l
Lead**	0.75*	25	—	50
Mercury	0.00057*	0.025*	—	144 ng/l
Naphthalene	620	2,350	—	—
Nickel**	56*	7.1*	—	13.4
Nitrobenzene	27,000	6,680	—	19.8 mg/l
Nitrophenols	230	4,850	(See below)	—
Mononitrophenol	—	—	—	70
Dinitrophenol	—	—	—	—
Trinitrophenol	—	—	—	—
2,4-Dinitro- <i>o</i> -cresol	—	—	—	13.4

Nitrosamines	5,850	3,300,000	—	—
N-Nitrosodimethylamine	—	—	1.4 ng/l	—
N-Nitrosodiethylamine	—	—	0.8 ng/l	—
N-Nitrosodiphenylamine	—	—	6.4 ng/l	—
N-Nitrosodiphenylamine	—	—	4.9	—
N-Nitrosopyrrolidine	—	—	16.0 ng/l	—
Pentachlorophenol	3.2	34	—	1.01 mg/l
Phenol	2,560	5,800	—	3.5 mg/l
Phthalate Esters	3	2,944	—	—
Dimethyl Phthalate	—	—	—	313 mg/l
Diethyl Phthalate	—	—	—	350 mg/l
Dibutyl Phthalate	—	—	—	34 mg/l
Di-2-ethylhexyl Phthalate	—	—	—	15 mg/l
Polychlorinated Biphenyls (PCBs)	.014*	0.030*	0.079ng/l	—
Polynuclear Aromatic Hydrocarbons (PAHs)	—	300	2.8 ng/l	—
Selenium	—	—	—	10
Selenite (inorganic)	35*	54*	—	—
Selenate (inorganic)	760	—	—	—
Silver	0.12	2.3	—	50
Tetrachloroethylene	840	450	0.8	—
Thallium	40	2,130	—	1.1
Toluene	17,500	5,000	—	14.3 mg/l
Toxaphene	0.013*	0.070	0.71 ng/l	—
Trichloroethylene	45,000	2,000	2.7	—
Vinyl Chloride	—	—	2.0	—
Zinc	47*	58*	—	—

*24-hour average

**At hardness of 50 mg/l as CaCO₃ for Freshwater Aquatic Life

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B

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